

**GERSTMAN SCHWARTZ**<sup>LLP</sup>  
ATTORNEYS AT LAW

October 16, 2020

**VIA ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 443  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 10/16/2020

**MEMO ENDORSED**

Re: *Al-Ahmed v. Twitter, Inc.*, Case No. 1:20-cv-04982

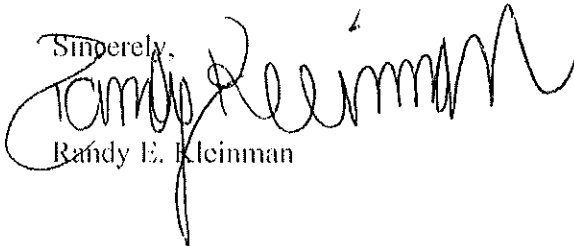
Dear Judge Caproni:

This firm represents the Plaintiff Ali Al-Ahmed ("Plaintiff") in the above-referenced matter. We submit this letter-motion on consent of all parties, pursuant to Your Honor's Individual Practices in Civil Cases Rules 2.A and 2.C, to respectfully request an extension of time to oppose Defendant Twitter, Inc.'s ("Defendant") respective motions filed under Docket Numbers 36-45, seeking, *inter alia*, 1) to dismiss Plaintiff's Complaint; and 2) requesting judicial notice regarding Defendant's motion to dismiss.

Plaintiff respectfully requests an extension because lead counsel on this matter is currently recovering from a surgery performed last week and has a trial scheduled to begin next week in Kings County Supreme Court.

The Plaintiff's opposition is currently due on October 19, 2020. This Plaintiff's first request for an extension of time. On consent of all parties, we respectfully request that Plaintiff be afforded an additional 30-days to submit opposition to the foregoing motions, and Twitter be afforded an additional 14 days to submit its reply. Thus, Plaintiff's new deadline to oppose the foregoing motions would be November 17, 2020, and the Defendant's deadline to reply would be December 17, 2020.

Thank you for Your Honor's prompt attention.

Sincerely,  
  
Randy E. Kleinman

**GERSTMANSCHWARTZ.COM**

The Plaintiff's response in opposition to the motions is due no later than **Friday, November 13, 2020**.  
Defendant's reply in support of the motions is due no later than **Friday, December 11, 2020**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

Date: October 16, 2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE